

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. 1:08 CR 55-V
	)	
vs.	)	<u>MOTION FOR TRANSFER OF INMATE</u>
	)	_____
EDWARD WILLIAM WAHLER	)	

**NOW COMES** the United States of America, by and through Gretchen C.F. Shappert, United States Attorney for the Western District of North Carolina, who requests that the above-referenced defendant be transferred from the Mecklenburg County Detention Facility to the Buncombe County Detention Facility. In support of this Motion, the United States shows unto the Court the following:

1. The defendant is currently detained in the custody of the United States Marshals at the Mecklenburg County Detention Facility.
2. The defendant has elected to proceed *pro se*.
3. The discovery in this case is voluminous (over 65,000 documents). The document discovery is contained on 5 DVD data discs. In addition to the document discs, there are 457 compact discs containing the undercover consensual recordings.
4. Because the Defendant is *pro se* and is incarcerated, the Government is prepared to provide a computer for the defendant to review discovery. The Mecklenburg County Detention Facility advised that they were not equipped to store the computer and discovery discs for the defendant's use nor could the Mecklenburg County Detention Facility guarantee a location where the defendant could regularly access the computer.

5. The Buncombe County Detention Center, which is utilized by the US Marshals Service, has agreed to store the discovery discs and computer when not in use by the defendant and will provide an area where the defendant can review discovery for up to four (4) hours per day .

**WHEREFORE**, it is respectfully requested that the Court allow this request and Order the United States Marshals Service to transfer the defendant to the Buncombe County Detention Center to facilitate the defendant's review of discovery.

Respectfully submitted, on this 18<sup>th</sup> day of August, 2008.

GRETCHEN C.F. SHAPPERT  
UNITED STATES ATTORNEY

\_\_\_\_s/ Jill Westmoreland Rose\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that on this, the 18th day of August, 2008, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the opposing party by operation of the Court's electronic filing system. This document may accessed through the electronic filing system.

/s/ Jill W. Rose  
Jill W. Rose  
Assistant U. S. Attorney